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July 24, 2025

**VIA ECF ONLY**

The Honorable Nancy E. Brasel  
U.S. District Court Judge  
United States District Court  
300 South Fourth Street  
Minneapolis, MN 55415

**RE:** *Women's Life Care Center et al., v. Keith Ellison, et al.*  
Case No. 24-cv-04250 (NEB/SGE)

Dear Judge Brasel:

This Firm represents the Plaintiffs in the above-referenced matter. On July 22, 2025, State Defendant Commissioner Tikki Brown, in her official capacity, filed a Motion to Dismiss (ECF No. 213) Plaintiff's Amended Complaint (ECF No. 163).

The other State Defendants and the Abortion Business Defendants named in the Amended Complaint previously filed motions to dismiss. Those motions were fully briefed, and the Court heard oral argument on July 11, 2025.

The State Defendants' Motion to Dismiss does not identify Defendant Brown as a movant, and the Legal Brief made no argument as to why the claims against her should be dismissed.

Pursuant to L.R. 7.1(c)(2), Plaintiffs will be filing a Response in Opposition to Defendant Brown's Motion to Dismiss the work week beginning July 28th.

Respectfully submitted,

*s/ Joseph R. Zakhary*

Joseph R. Zakhary